

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

D&Z AUCTION RESELLERS, LLC AND  
GUSTAVO A. MORENO PONCE

Plaintiffs

V.

MEDIA DATA CORPORATION, et als

Defendants

CIVIL NO. CIVIL 19-1242(WGY)

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**PROPOSED SCHEDULING ORDER**

**TO THE HONORABLE COURT:**

COME NOW the parties, through their undersigned attorneys and very respectfully present this proposed Scheduling Order:

1. On November 17, 2020, the Honorable Court ordered the parties to present a proposal for a Scheduling Order.
2. The parties met and present the following proposal for a Scheduling Order.
3. The parties will exchange Rule 26 initial disclosures no later than December 15, 2020.
4. As the Court is aware, at the November 17, 2020 hearing, the Court ordered that Defendants would have 15 days to submit renewed motions to dismiss the Amended Complaint, should they choose to do so. In light of the Court's order, all parties agree that (apart from initial disclosures) formal discovery should not commence until the Court has adjudicated any renewed motions to dismiss the Amended Complaint.
5. The parties further propose the following deadlines for discovery:

- a. All document discovery and depositions must be completed within 6 months of the Court's disposition of the renewed motions to dismiss.
  - b. Any dispositive motions shall be filed within 30 days after the close of discovery. Oppositions to dispositive motions shall be filed within 30 days thereafter. Replies (if any) shall be filed with 14 days after the filing of any opposition.
  - c. An initial pretrial conference shall be held within 60 days of the submission of fully briefed dispositive motions, but in no event shall take place later than December 15, 2021.
6. If the Court does not agree that discovery should be stayed pending the resolution of the renewed motions to dismiss, the parties respectfully request that the dates outlined above be calculated from the date the motions to dismiss are filed.

WHEREFORE: The parties respectfully request that the Honorable Court approved the afore discussed discovery and dispositive motions schedule.

I HEREBY CERTIFY that on this same day, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. This electronic system will send a notification of this motion to all parties of record.

In San Juan, Puerto Rico, this 2<sup>nd</sup> of December, 2020.

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